

1 Norberto J. Cisneros, Esq., NV Bar No. 8782
2 Barbara M. McDonald, Esq., NV Bar No. 11651
3 **MADDOX & CISNEROS LLP**
4 3230 S. Buffalo Drive, Suite 108
Las Vegas, Nevada 89117
Telephone: (702) 366-1900
Facsimile: (702) 366-1999

George Haines, Esq.
Nevada Bar No. 9411

Gerardo Avalos, Esq.
Nevada Bar No. 1517

FREEDOM LAW FI

FREEDOM LAW FIRM, LLC
8985 South Eastern Ave., Suite 350
Las Vegas, NV 89123
(702) 880-5554
(702) 385-5518 (fax)
ghaines@freedomlegalteam.com

Michael Kind, Esq.
Nevada Bar No: 13903

NEVADA BAR
KIND LAW

KIND LAW
8860 South Maryland Parkway, Suite 106
Las Vegas, Nevada 89123
(702) 337-2322
(702) 329-5881 (fax)
mk@kindlaw.com

Attorneys for Plaintiff

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

SARA SANGUINETTI, individually and on behalf of all others similarly situated,

Plaintiff.

VS

UNIVERSITY MEDICAL CENTER OF SOUTHERN NEVADA.

Defendant.

CASE NO.:2:21-cv-01779-JAD-EJY

**STIPULATION AND ORDER TO
EXTEND DEADLINES FOR
RESPONSE AND REPLY TO
MOTION TO DISMISS FIRST
AMENDED CLASS ACTION
COMPLAINT**

1 Plaintiff, Sara Sanguinetti, individually and on behalf of all others similarly situated, and
 2 Defendant, University Medical Center of Southern Nevada, by and through their respective counsel,
 3 hereby stipulate and agree as follows:

4 1. Defendant filed its Motion to Dismiss First Amended Class Action Complaint on
 5 May 24, 2022 (“Motion”) (ECF No. 13).

6 2. The parties stipulate and agree that the time for Plaintiff to file her Response to the
 7 Motion shall be extended two weeks to Tuesday, June 21, 2022, in order to allow Plaintiff time to
 8 analyze and respond to Defendant’s extensive arguments.

9 3. The parties further stipulate and agree that the time for Defendant to file its Reply in
 10 support of the Motion shall be extended seventeen days to Friday, July 8, 2022, in order to allow
 11 Defendant time to further analyze and reply to the arguments at issue.

12 This is the first stipulation for extension of time to file motions.

14 DATED this 1st day of June, 2022.

15 **MADDOX & CISNEROS LLP**

19 By: /s/ Norberto J. Cisneros

20 Norberto J. Cisneros, Esq., NV Bar No. 8782
 Barbara McDonald, Esq., NV Bar No. 11651
 3230 S. Buffalo Drive, Suite 108
 Las Vegas, Nevada 89117
Attorneys for Plaintiff

23 George Haines, Esq.

24 Nevada Bar No. 9411

25 Gerardo Avalos, Esq.

26 Nevada Bar No. 15171

FREEDOM LAW FIRM, LLC

27 8985 South Eastern Ave., Suite 350
 28 Las Vegas, NV 89123

Michael Kind, Esq.

Nevada Bar No.: 13903

KIND LAW

14 DATED this 1st day of June, 2022.

15 **KOELLER NEBEKER CARLSON
& HALUCK, LLP**

19 By: /s/ Mark F. Roach

20 Mark F. Roach, Esq., NV Bar 8237
 Andrew C. Green, Esq., NV Bar 9399
 300 S. 4th Street, Suite 500
Attorneys for Defendant

23 ORDER

25 IT IS SO ORDERED.

27 
 28 U.S. District Judge Jennifer A. Dorsey
 Dated: June 7, 2022